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October 26, 2015

The Honorable Frank Maas  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Room 740  
New York, NY 10007

***Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM)***

Dear Judge Maas:

Counsel for Defendant Wa'el Jelaidan has learned from Counsel for Defendant Yassin Kadi of an error in Jelaidan's recent Opposition (Docket number 3062) to Plaintiffs' motion to compel production. Namely, Kadi's attorneys informed undersigned counsel that there were no "jointly-held accounts" between Jelaidan and Kadi. Undersigned counsel stated erroneously on page 5, line 12 of the Opposition that "it is a leap in logic to argue that because Defendant Jelaidan authorized Mr. Kadi to access their jointly-held accounts, he would be able to access those same accounts himself." The error has been corrected by deleting this sentence from the attached corrected Opposition.

Respectfully submitted,

/s/ Martin McMahon  
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